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**BEFORE THE
SURFACE TRANSPORTATION BOARD**

REGULATIONS GOVERNING FEES
FOR SERVICES

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) Ex Parte No. 542 (Sub-No. 18)
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)

**REPLY COMMENTS OF
WESTERN COAL TRAFFIC LEAGUE
AMERICAN PUBLIC POWER ASSOCIATION
NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION
and
EDISON ELECTRIC INSTITUTE**

The Western Coal Traffic League, the American Public Power Association, the National Rural Electric Cooperative Association, and the Edison Electric Institute (“EEI”) (collectively, “Coal Shippers”)¹ submit the following reply comments on the Board’s Notice of Proposed Rulemaking (“NPRM”) in the above-captioned proceeding.

In their opening comments, Coal Shippers strongly supported the Board’s NPRM, and requested that the Board adopt the fee changes proposed therein as soon as possible. All parties that filed opening comments supported the Board’s NPRM, and no party opposed any aspect of the NPRM. Included with those who supported the NPRM was the U.S. Department of Agriculture, which “commend[ed]” the Board for its proposal, stating that the Board’s current fee structure may discourage shippers from

¹ EEI, the association of U.S. shareholder-owned electric utility companies representing approximately 70 percent of the U.S. electric power industry, did not participate in the Coal Shippers’ opening comments, but it hereby supports and adopts those comments.

bringing complaints and should be replaced by the proposed fee schedule included in the NPRM. *See* Comments of the U.S. Department of Agriculture at 1, 3.

Coal Shippers respectfully submit that, for all of the reasons set forth in their opening comments, which support was echoed by all parties filing opening comments, and for the uncontested reasons set forth in the Board's NPRM, the Board should promptly adopt its NPRM proposal and cap agency complaint filing fees.

Respectfully submitted,

WESTERN COAL TRAFFIC LEAGUE
AMERICAN PUBLIC POWER ASSOCIATION
NATIONAL RURAL ELECTRIC
COOPERATIVE ASSOCIATION
EDISON ELECTRIC INSTITUTE

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